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22 *and Debra King*

23 **UNITED STATES DISTRICT COURT**
24 **DISTRICT OF NEVADA**

25 T1 PAYMENTS LLC, a Nevada limited liability
26 company,

27 Plaintiff,

28 vs.
NEW U LIFE CORPORATION, a California
corporation,

Defendant.

CASE NO. 2:19-cv-01816-APG-DJA

**JOINT STIPULATION REGARDING
TIMING FOR BRINGING
CONFIDENTIALITY DESIGNATION
MOTIONS UNDER ECF Nos. 92-93**

29 NEW U LIFE CORPORATION, a California
30 corporation,

31 Counterclaimant,

32 vs.
T1 PAYMENTS LLC, et al.,

33 Counterclaim-Defendants.

1 Plaintiff and counterclaim-defendant, T1 Payments LLC; counterclaim-defendants T1
2 Payments Limited, TGlobal Services Limited, Donald Kasdon, Amber Fairchild, and Debra King
3 (the “T1 Parties”); and defendant and counterclaimant New U Life Corp. (collectively, the
4 “Parties”), submit this joint stipulation regarding the timing to bring a motion under the Joint
5 Stipulated Protective Order, ECF Nos. 92 and 93. Discovery is stayed as to Payvision, B.V. and
6 the relief sought does not affect Payvision. Thus, Payvision is not included in this joint stipulation.

7 On February 2, 2021, T1 Payments and New U Life filed a joint stipulation and proposed
8 order for protection of confidential information disclosed during discovery (ECF No. 92), which
9 the Court entered on February 3 (ECF No. 93). The joint stipulation provides a procedure for
10 designating materials produced during discovery confidential, as well as challenging the
11 confidentiality designation. (See ECF No. 92 at 3–6.) To challenge another party’s confidentiality
12 designation, the parties must hold a meet and confer to attempt to resolve the challenge in good
13 faith. If the parties cannot resolve a challenge, the protective order states that the party designating
14 confidentiality “may file and serve a motion to retain confidentiality by no later than 14 days after
15 the parties first meet and confer...” (Id. at 6, Section 4(c).)

16 The Parties’ counsel met and conferred on December 14, 2021, regarding mutual
17 challenges to confidentiality designations. The Parties were unable to resolve their mutual
18 challenges and therefore wish to bring motions to retain confidentiality. However, the deadline
19 for bringing such motions is currently December 28, 2021. Due the holidays and the Parties’
20 counsel’s schedules, the Parties have agreed to extend the deadline to bring such motions until
21 January 11, 2022.

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1 THEREFORE, the Parties stipulate and agree, through their respective counsel, that good
2 cause exists to extend the deadlines set forth in the stipulated protective order (ECF No. 92) and
3 allow the Parties to bring motions to maintain confidentiality designations by January 11, 2022.
4 Granting the requested relief will not affect any other deadline in the litigation.

5 Dated this 16th day of December, 2021.

6 Respectfully submitted,

7 KAPLAN COTTNER

8 /s/ Kory L. Kaplan
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14 By: /s/ Brianna Dahlberg

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18 Brianna Dahlberg, Esq.
19 Eugene Rome, Esq.

20 *Attorneys for Defendant and Counterclaimant*
New U Life Corporation

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22 IT IS SO ORDERED:
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25 DANIEL J. ALBREGTS
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: December 17, 2021

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